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From: Pellegrini, Janet
Sent: Wed 5/4/2016 8:25:04 PM
Subject: Qs re New NPDES GP implementation

Catherine,

I have a couple of questions that regard IDEM's general permit program interim conversion implementation.

IDEM's five GP Sectors completed to date are: NC Cooling Water, Petroleum Products Terminals, Sand & Gravel Operations, GW Petroleum Remediation and Hydrostatic Testing of Commercial Pipelines.

Given that IDEM has these 5 sectors that have completed the drafting and approval of administratively issued NPDES general permits in place of the permit by rule issuance of NOIs. And also that the Indiana Administrative Code language changes were made to allow those 5 sectors to move forward and be issued as regular general permits, while the other 5 sectors are being drafted. I have a couple of questions to understand the status of permit coverage & reissuance of NOIs in these sectors.

What I would like to get clarification on is:

- 1) Have all of those completed 5 GP sector permittees been notified that they must reapply for coverage for all existing discharges under the new admin-issued general permit by a date certain, at which time their NOI coverage under the permit by rule expires? If so, what is that expiration or deadline date by which they must reapply?
- 2) What was the effective date of notification to the permittees where all new NOIs in these 5 GP sectors began to be processed under the admin-issued NPDES general permits which has the 5 year permit term?

It may be that once you respond I will have follow up question or two, but at this point I just need to understand how these converted sectors are being handled.

Thanks much,

Janet

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“Those who dwell, as scientists or laymen, among the beauties and mysteries of the earth, are never alone or weary of life.”

— Rachel Carson